



Vancouver **International** Airport Authority  
Administration de l'aéroport international de Vancouver  
P.O. Box 23750  
Airport Postal Outlet  
Richmond, B.C. Canada  
V7B 1Y7

DEPARTMENT OF TRANSPORTATION

99 FEB 25 AM 8:57

DOCKET SECTION

FAA-98-4758-5

**Comments on the Hatch Amendment**

It is the opinion of the Vancouver International Airport Authority that the Hatch Amendment to the U.S. Anti Terrorism and Effective Death Penalty Act (hereinafter referred to as the Hatch Amendment) is overreaching and has enormous potential impact on the current status of Open Skies.

Leaving aside the very important issue of extraterritorial legislation, which is best handled through diplomatic channels, the unilateral imposition of the amendment undermines the very effective consultative process which has been occurring in security and other matters.

The basis of our National security program is threat assessment. The Hatch amendment is a complete reversal of this prudent and effective policy.

The Vancouver International Airport Authority has an extensive, tested and valid security program, consistently receiving high marks from both our regulator (Transport Canada) and the travelling public. The Hatch Amendment would not only prescribe what must be done, but how. Our current mix of the Royal Canadian Mounted Police and a highly trained private security force is fully capable of developing the procedures for ensuring security.

In some areas, our national standards already exceed those of the United States. For example, only passengers are allowed post security, and a national assessment of each Restricted Area Pass Holder is performed by our Security and Intelligence services. Neither of these measures is currently performed in the United States.

The technical questions surrounding this amendment are enormous. The efficacy of X-ray screening technology is problematic. Requiring adherence to FM technical specifications (which are themselves subject to rapid change) will impose a large cost burden on airports (and air carriers). We dispute the cost analysis conducted by the OMB – the cost of procuring associated technology in screening devices, infrastructure modifications and security hardware compliance alone will be onerous, leaving aside training costs.

The Vancouver International Airport Authority submits that the Hatch Amendment be modified after consultation with foreign air carriers and airports to which it applies.

Craig Richmond  
Vice President Airport Operations  
Vancouver International Airport Authority